VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

- A description of the construction of the Control Technologies, CEMS, and PM Early Warning Systems required by this Consent Decree, including:
 - If construction is not underway, any available information concerning the construction schedule and the execution of major contracts.

Consistent with the provisions of the Consent Decree, physical, on-site construction of Control Technologies and CEMS did not commence at the Ville Platte facility during the relevant reporting period.

The current projected schedule for construction activity, including execution of major contracts, has been updated with the latest project schedule information.

- Construction Schedule:
 - Preliminary Engineering & Assemble FEED Package 4/2017 through 11/2017
 - Front End Engineering & Design 4/2018 through 2/2019
 - Equipment fabrication 4/2018 through 7/2019
 - Detailed Engineering 10/2018 through 2/2019
 - Construction 10/2018 through 5/2020
 - Start up / Commissioning 5/2020 through 8/2020
 - Compliance 9/11/2020
- ii. If construction is underway, the estimated percent of installation as of the end of the reporting period, the current estimated construction completion date, and a brief description of completion of significant milestones during the reporting period.
 - Consistent with the provisions of the Consent Decree, physical, on-site construction activity did not commence during the relevant reporting period.
- Any information indicating that installation and commencement of operation may be delayed, including the nature and cause of the delay.
 - Based upon the best information currently available, Cabot has not identified any basis to anticipate any delay in satisfying the installation and construction schedules established under the Consent Decree.
- iv. Once construction is complete, provide the dates the equipment was placed in service and/or commenced Continuous Operation and the dates of any testing that was performance during the period.

Consistent with the provisions of the Consent Decree, construction activity for the control equipment was not completed during the relevant reporting period.

In satisfaction of the relevant terms of the Consent Decree, Cabot installed the equipment associated with the PM Early Warning Systems (PMEWS), established the alarm set-points, and commenced continuous operation of the system as of the Effective Date of the Consent Decree. The Consent Decree establishes no

VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

testing requirements for the system during this reporting period.

- b. All information necessary to demonstrate compliance with all applicable Emissions Limits, 30-day Rolling Average Sulfur Content Weight Percent, 365-day Rolling Average Sulfur Content Weight Percent, and other provisions in Sections VI (SO₂ Control Technology, Emissions Limits, and Monitoring Requirements), VII (NOx Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements)
 - Paragraph 17 SO₂ Process System Operation, Emissions Limits and Control Technology

Pursuant to the terms of the Consent Decree, Cabot was not required during the relevant reporting period to demonstrate compliance with any applicable emissions limit, or other provision in Sections VI (SO₂ Control Technology, Emissions Limits, and Monitoring Requirements), VII (NOx Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements) under the Consent Decree, except as specifically addressed herein.

Paragraph 18 - WGS Design Specifications

Pursuant to the terms of the Consent Decree, submittal of design specifications for the WGS is not required until 30 months prior to installation, specifically no later than March 11, 2018.

Paragraph 19 - SO₂ Alternative Equivalent Pollution Control Technology

Pursuant to the terms of the Consent Decree, if a SO₂ Alternative Equivalent Pollution Control Technology is elected, compliance with these requirements is not required until 30 months from the date of Continuous Operation of the WGS at the Canal Plant, specifically no later than September 11, 2020, provided that a written request is made by March 11, 2018 and written approval has been obtained

Paragraph 20 - SO₂ Monitoring Requirements

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required until 30 months from the date of Continuous Operation of the WGS at the Canal Plant, specifically no later than September 11, 2020.

Paragraph 23 - NOx Emissions Limits Applicable to Heat Load Operation, Startup, and Shutdown

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required until 30 months from the date of Continuous Operation of the SCR at the Canal Plant, specifically no later than September 11, 2020.

Paragraph 24 - Heat Load Operation, Startup, and Shutdown Compliance Calculation

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required until 30 months from the date of Continuous Operation of the SCR at the Canal Plant, specifically no later than

Page 2

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REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

September 11, 2020.

Paragraph 25 - Alternative Heat Load Operation, Startup, and Compliance Calculation

Pursuant to the terms of the Consent Decree, if this alternative is elected, submittal of a written request must be made within 24 months of the Effective Date of the Consent Decree (specifically no later than March 11, 2016) and written approval has been obtained for the alternative calculation.

Paragraph 26 - NOx Process System Operation Emissions Limits and Control Technology

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required until 30 months from the date of Continuous Operation of the SCR at the Canal Plant, specifically no later than September 11, 2020.

Paragraph 27 - SCR Design Specifications

Pursuant to the terms of the Consent Decree, submittal of design specifications for the SCR is not required until 30 months prior to installation, specifically no later than March 11, 2018.

Paragraph 28 - NOx Alternative Equivalent Pollution Control Technology

Pursuant to the terms of the Consent Decree, if the NOx Alternative Equivalent Pollution Control Technology is elected, compliance with these requirements is not required until 30 months from the date of Continuous Operation of the SCR at the Canal Plant, specifically no later than September 11, 2020, provided that a written request is made by March 11, 2018 and written approval has been obtained.

Paragraph 29 - NOx Monitoring Requirements

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required until 30 months from the date of Continuous Operation of the SCR at the Canal Plant, specifically no later than September 11, 2020.

Paragraph 30 - PM Control Technology and Emissions Limits

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required until 30 months and 180 days from the date of Continuous Operation of the WGS at the Canal Plant, specifically no later than September 11, 2020.

Paragraph 31 - PM Stack Testing

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required until 30 months and 180 days from the date of Continuous Operation of the WGS at the Canal Plant, specifically no later than September 11, 2020.

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REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

Paragraph 32 and Appendix B - Other PM Control Requirements

During the reporting period, Cabot achieved and maintained compliance with the requirements of Paragraph and Appendix B of the Consent Decree relative to particulate matter ("PM") control requirements. More specifically, for each PM emissions equipment unit:

- Cabot employed the required PM Reduction Mechanism and Method for Managing PM Emissions specified in Appendix B of the Consent Decree.
- Cabot completed the relevant daily visual assessments and maintained a record of the results of each such assessment.
- No visible emissions were observed during any of the required daily visual assessments. Accordingly, Cabot was not required during this reporting period to perform any six-minute Method 9 observations in response to an observation of visible emissions during the required daily visual assessments.
- Cabot developed and maintained a record of the results of each of the required daily visual assessments, when applicable.
- Paragraph 33 and Appendix C Particulate Emissions Best Management Practices Control Plan

Cabot implemented the Particulate Emissions Best Management Practices Control Plan set forth in Appendix C of the Consent Decree, to the extent required during the reporting period.

Paragraph 34 and Appendix D - PM Early Warning System

Cabot maintained compliance with applicable requirements of the Consent Decree related to the PM Early Warning System throughout the reporting period. During the reporting period, Cabot operated each PM Early Warning System at all times of Heat Load Operation and Process System Operation, except during system breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments of the applicable system, and for each PM Early Warning System.

During the reporting period, Cabot achieved a data availability of greater than 90% based on a quarterly average of the operating time of the emission unit or activity being monitored, and therefore, achieved full compliance with the minimum degree of availability requirements of the Consent Decree. In addition, in response to any alarm triggered during the reporting period for any PM Early Warning System at the facility, Cabot investigated the cause of the alarm as expeditiously as practicable and performed the required sequence of tasks to respond to the alarm.

On each Operating Day in this reporting period, Cabot conducted a visual review of the recorded data for each PM Early Warning System to identify trends in relative PM emissions.

Cabot also conducted routine maintenance during the reporting period in accordance with manufacturer's recommendations as addressed within the provisions in Paragraphs D.8a and D.8b of the Consent Decree.

VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

- d. All CEMS data collected for each Process System, from the time any Emissions Limit in Sections VI (SO₂ Control Technology, Emissions Limits, and Monitoring Requirements) and VII (NOx Control Technology, Emissions Limits, and Monitoring Requirements) is exceeded until compliance is achieved, and an explanation of any periods of downtime of such CEMS.
 - Paragraph 20 SO₂ Monitoring Requirements

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required until 30 months from the date of Continuous Operation of the WGS at the Canal Plant, specifically no later than September 11, 2020.

Paragraph 29 - NOx Monitoring Requirements

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required until 30 months from the date of Continuous Operation of the SCR at the Canal Plant, specifically no later than September 11, 2020.

- e. A copy of the protocol for any PM stack tests performed in accordance with the requirements of Paragraph 31
 - Paragraph 31 PM Stack Testing

Pursuant to the terms of the Consent Decree, compliance with these requirements is not required to begin until 30 months and 180 days from the date of Continuous Operation of the WGS at the Canal Plant.

f. All PM Early Warning System data collected, from the time a PM Early Warning System alarm is triggered until the PM Early Warning System data have returned to normal operating ranges, below levels triggering an alarm condition, and an explanation of any periods of PM Early Warning System downtime

Data collected for each event in which a PM Early Warning System alarm was triggered during this reporting period is presented in **Attachment 1**.

A summary of the periods of PM Early Warning System downtime, providing the required explanation for each such period, is presented in **Attachment 2**.

- g. A description of any violation of the requirements of this Consent Decree, including any violation resulting from Malfunctions, any exceedance of an Emissions Limit, any exceedance of a 30-day rolling Average Sulfur Content Weight Percent or 365-day Rolling Average Weight Percent, or any failure to install, commence operation or Continuously Operate and Control Technology or any PM Early Warning System, which includes:
 - i. the date and duration of, and the quantity of any emissions related to, the violation;
 - ii. a full explanation of the primary root cause and any other significant contributing cause(s) of the violation;
 - iii. a root cause analysis of all reasonable interim and long-term remedial steps or corrective actions, including all design, operation, and maintenance changes consistent with good engineering practices, if any, that

VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

could be taken to reduce or eliminate the probability of recurrence of such violation, and, if not already completed, a schedule for its (their) implementation, or, if Defendant concludes that remedial steps or corrective actions should not be conducted, the basis for that conclusion.

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

h. If no violations occurred during a reporting period, include a statement that no violations occurred.

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

 A description of the status of any permit applications and any proposed SIP revisions required under this Consent Decree

Cabot was not required under the Consent Decree to submit any permit applications or any proposed SIP revision during this reporting period.

j. A summary of all actions undertaken and Project Dollars expended during the reporting period, as well as any cumulative Project Dollars expended, and the estimated environmental benefits achieved to date in satisfaction of the requirements of Section V (Environmental Mitigation) and Appendix A.

A project completion notification was filed with the US EPA on November 2, 2015. This is complete.

VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

ATTACHMENT 1

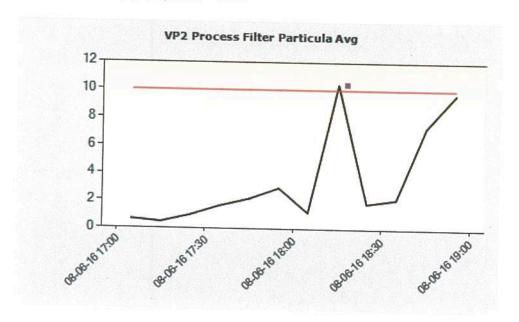
PM EARLY WARNING SYSTEM DATA COLLECTED DURING HIGH PM EMISSIONS EVENTS

VILLE PLATTE PLANT

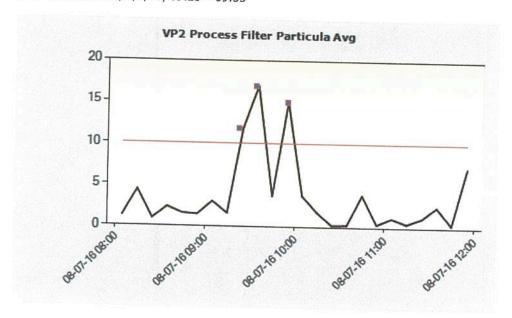
REPORTING PERIOD: JULY 1, 2016

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VP-2 Process Filter, 8/6/16, 18:15 - 18:15



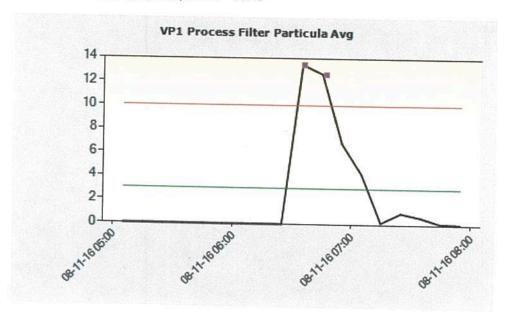
VP-2 Process Filter, 8/7/16, 09:25 - 09:55



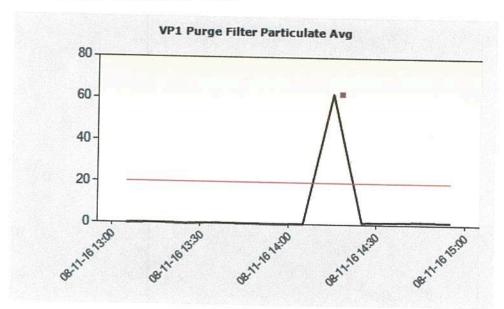
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

VP-1 Process Filter, 8/11/2016, 06:35 - 06:45



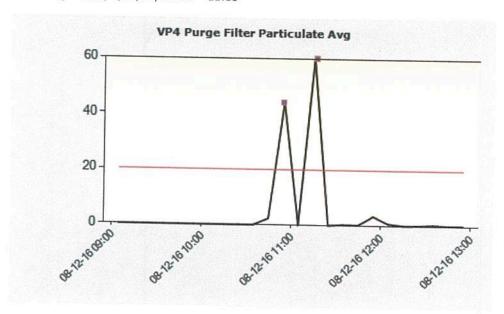
VP-1 Purge Filter, 8/11/16, 14:15 – 14:15



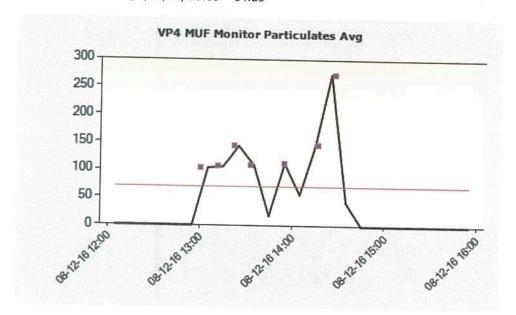
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

VP-4 Purge Filter, 8/12/16, 10:55 – 11:15



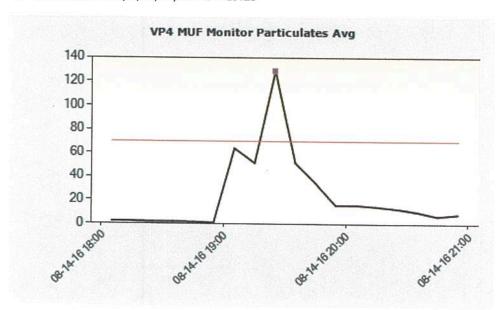
VP-4 Main Unit Filter, 8/12/16, 13:05 – 14:25



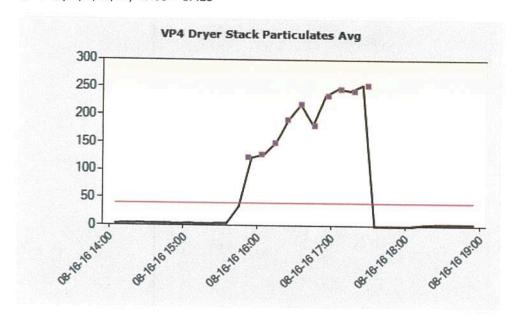
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

VP-4 Main Unit Filter, 8/14/16, 19:25 - 19:25



VP-4 Dryer, 8/16/16, 15:55 - 17:25

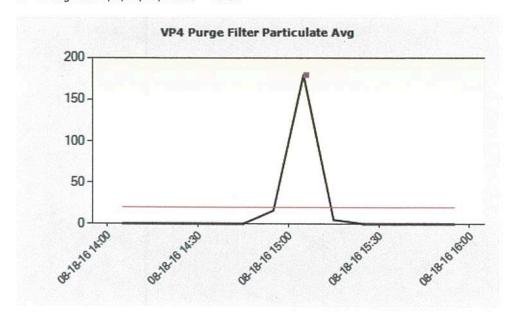


VILLE PLATTE PLANT

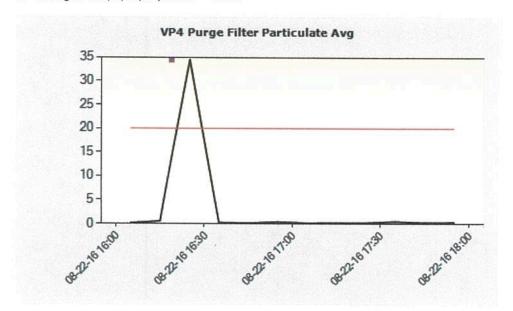
REPORTING PERIOD:

JULY 1, 2016 - DECEMBER 31, 2016

VP-4 Purge Filter, 8/18/16, 15:05 - 15:05



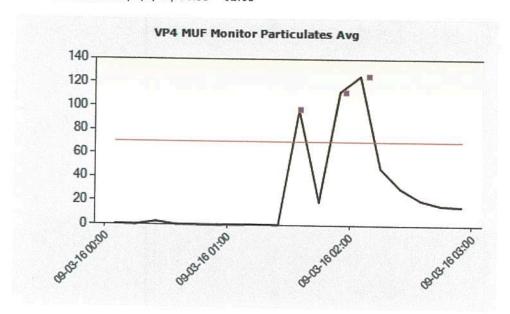
VP-4 Purge Filter, 8/22/16, 16:25 - 16:25



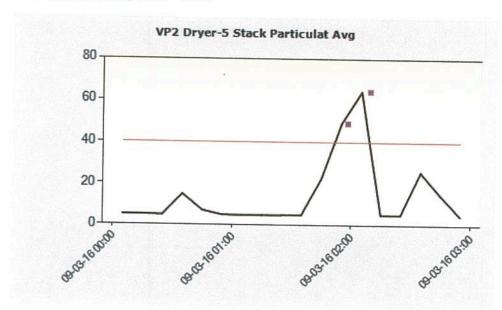
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

VP-4 Main Unit Filter, 9/3/16, 01:35 - 02:05



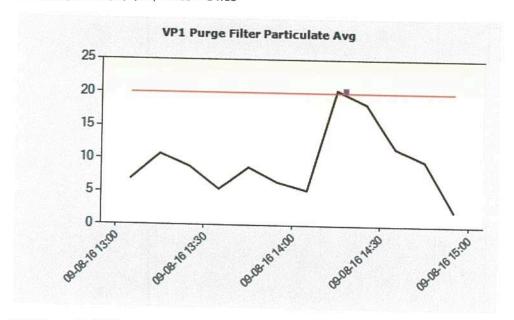
VP-2 Dryer-5, 9/3/16, 01:55 - 02:05



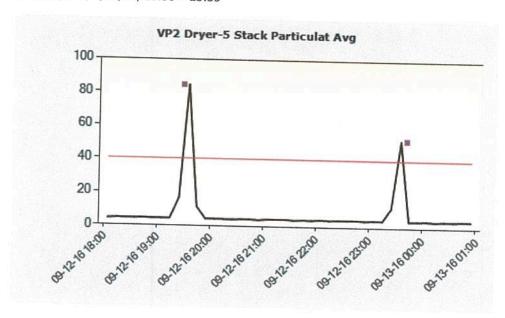
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

VP-1 Purge Filter, 9/8/16, 14:15 - 14:15



VP-2 Dryer-5, 9/12/16, 19:35 - 23:35

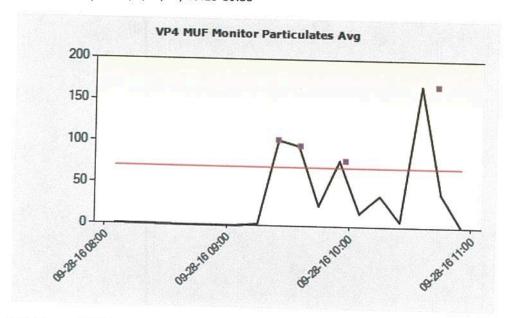


VILLE PLATTE PLANT

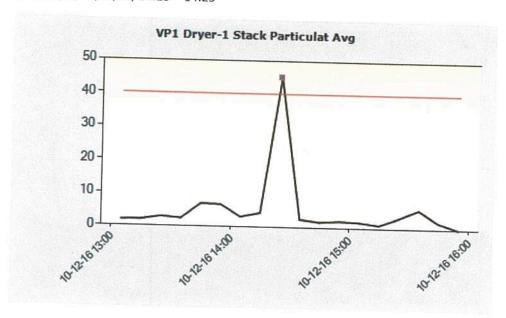
REPORTING PERIOD:

JULY 1, 2016 - DECEMBER 31, 2016

VP-4 Main Unit Filter, 9/28/16, 09:25-10:35



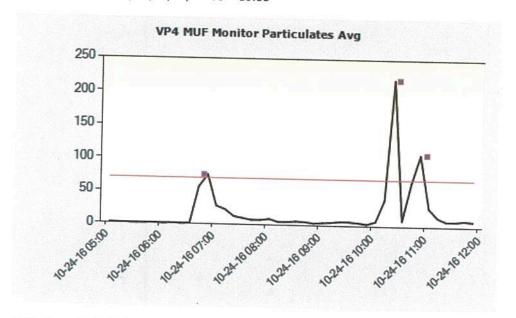
VP-1 Dryer, 10/12/16, 14:25 - 14:25



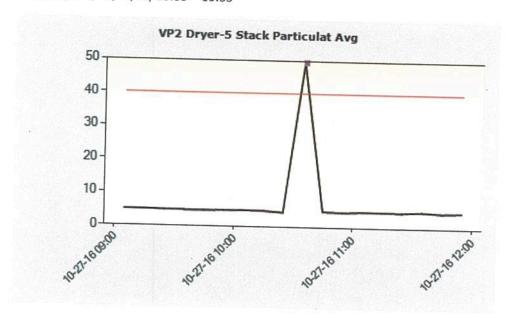
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

VP-4 Main Unit Filter, 10/24/16, 06:55 - 10:55



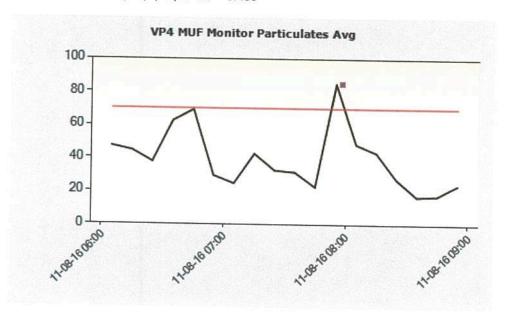
VP-2, Dryer-5, 10/27/16, 10:35 - 10:35



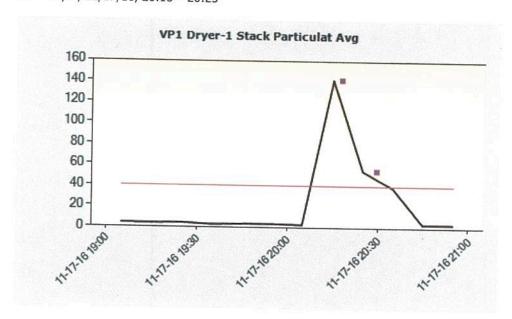
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

VP-4 Main Unit Filter, 11/8/16, 07:55 - 07:55



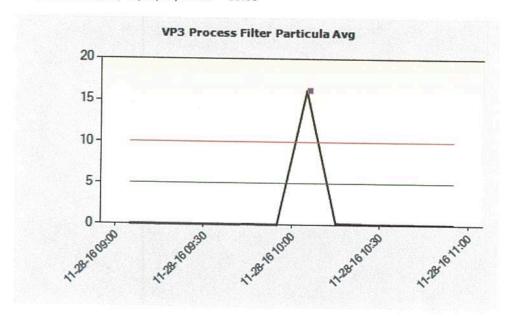
VP-1 Dryer, 11/17/16, 20:15 - 20:25



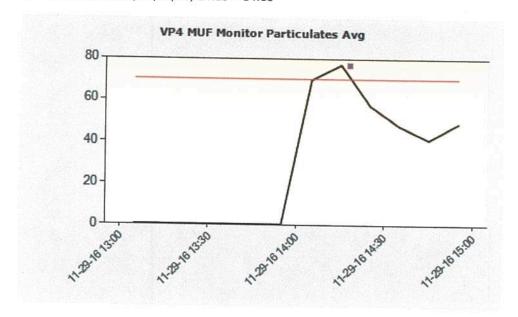
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

VP-3 Process Filter, 11/28/16, 10:05 - 10:05



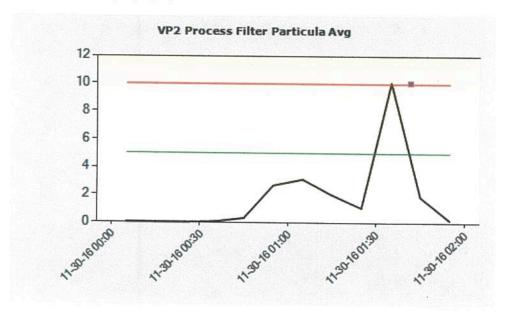
VP-4 Main Unit Filter, 11/29/16, 14:15 - 14:15



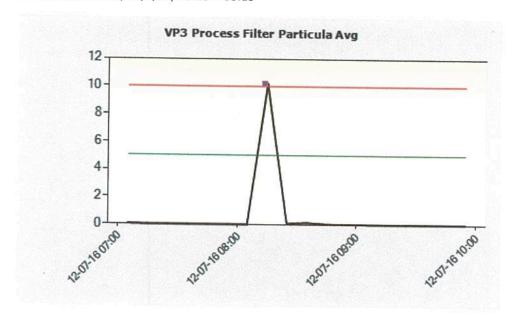
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

VP-2 Process Filter, 11/30/16, 01:35 - 01:35



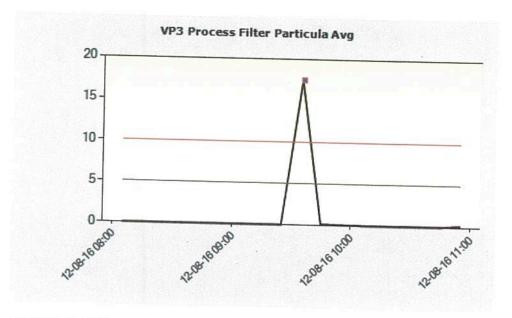
VP-3 Process Filter, 12/7/16, 08:15 - 08:15



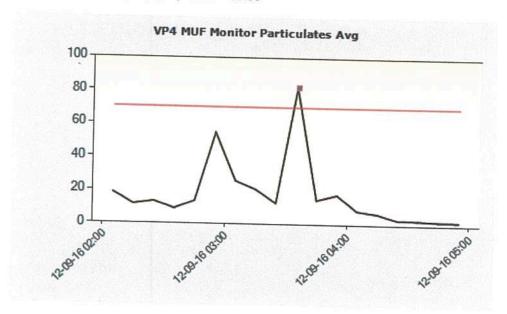
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

VP-3 Process Filter, 12/8/16, 09:35 - 09:35



VP-4 Main Unit Filter, 12/9/16, 03:35 - 03:35

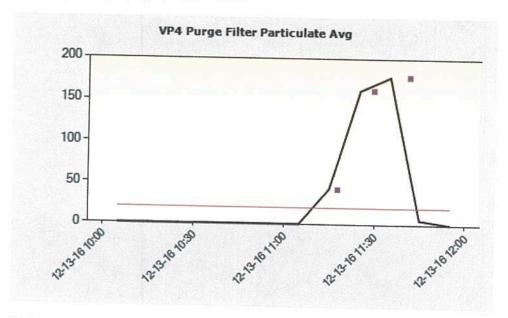


VILLE PLATTE PLANT

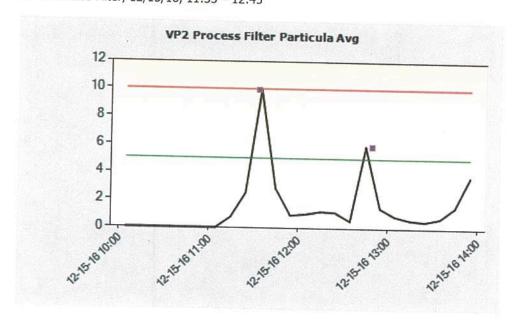
REPORTING PERIOD:

JULY 1, 2016 - DECEMBER 31, 2016

VP-4 Purge Filter, 12/13/16, 11:15 – 11:35



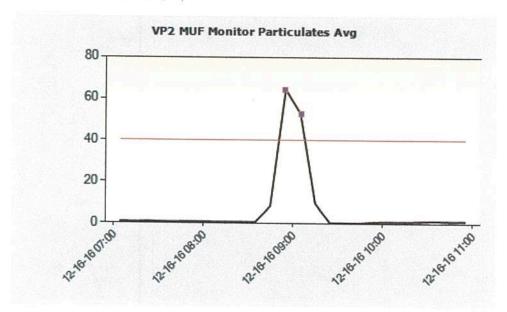
VP-2 Process Filter, 12/15/16, 11:35 – 12:45



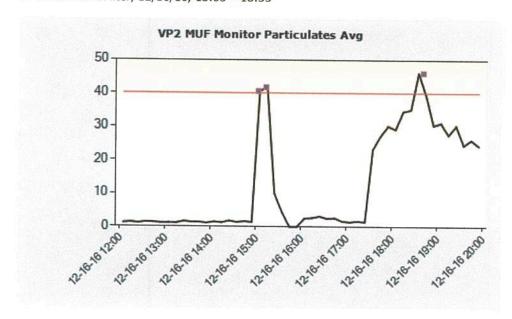
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

VP-2 Main Unit Filter, 12/16/16, 08:55 - 09:05



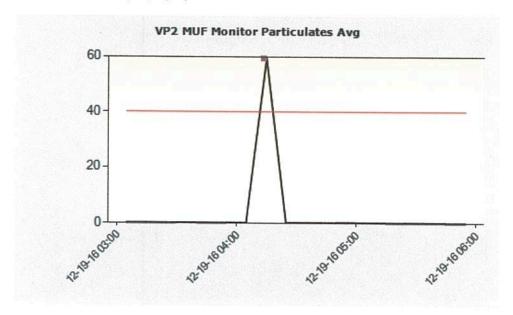
VP-2 Main Unit Filter, 12/16/16, 15:05 – 18:35



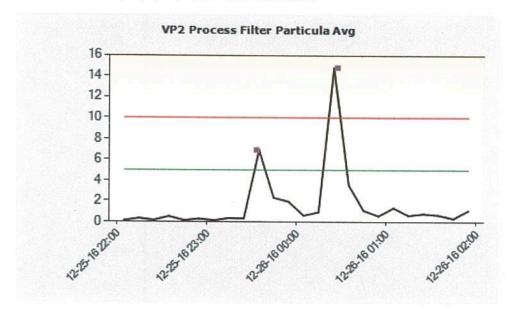
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

VP-2 Main Unit Filter, 12/19/16, 04:15 - 04:15



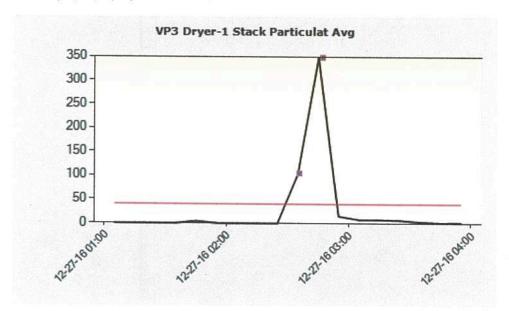
VP-2 Process Filter, 12/25/16, 23:35 - 12/26/16, 00:25



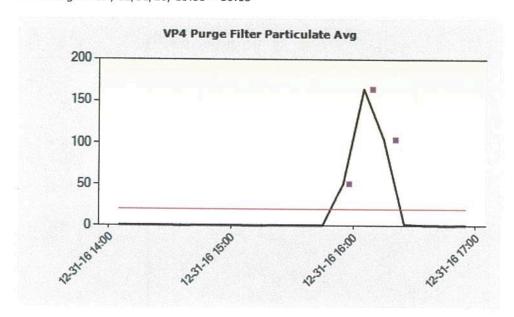
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

VP-3 Dryer, 12/27/16, 02:35 - 02:45



VP-4 Purge Filter, 12/31/16, 15:55 - 16:15



VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

ATTACHMENT 2

EXPLANATION OF PERIODS OF PM EARLY WARNING SYSTEM DOWNTIME

VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 - DECEMBER 31, 2016

PMEWS Data Availability Summary - 01-Jul-16 to 30-Sep-16



Unit	Source	Data Availability %	Permit Availability %	Unit Uptime Hours	Probe Uptime Hours	Consent Decree
VP-1	Dryer	99.57	90.00	1,871.87	1,863.87	Y
VP-1	MUF	99.62	90.00	1,943.63	1,936.16	Y
VP-1	Process Filter	99.42	90.00	1,943.63	1,932.33	Y
VP-1	Purge Filter	99.60	90.00	1,871.87	1,864.41	Ý
VP-2	Dryer-1	99.44	90.00	1,292.55	1,285.28	Ý
VP-2	Dryer-2	99.94	90.00	1,358.17	1,357.42	Ý
VP-2	Dryer-3	99.57	90.00	1,897.18	1,888.97	Ý
VP-2	Dryer-4	99.41	90.00	1,237.62	1,230.36	Ý
VP-2	Dryer-5	99.93	90.00	1,054.20	1,053.45	Y
VP-2	MUF	99.63	90.00	1,988.96	1,981.69	Y
VP-2	Process Filter	99.63	90.00	1,988.96	1,981.57	Y
VP-2	Purge Filter	99.62	90.00	1,953.29		
VP-3	Dryer	99.63	90.00	1,953.49	1,945.83	Y
VP-3	MUF	99.65	90.00	939 1. 25	1,946.23	Y
VP-3	Process Filter	99.65	90.00	2,060.62	2,053.35	
VP-3	Purge Filter	99.63	90.00	2,060.62	2,053.35	Y
VP-4	Dryer	99.51		1,953.49	1,946.23	Y
VP-4	MUF		90.00	1,629.77	1,621.71	Y
VP-4	Process Filter	99.57	90.00	1,796.40	1,788.67	Y
VP-4	Purge Filter	99.60	90.00	1,796.40	1,789.13	Υ
V1 -4	ruige riilei	99.19	90.00	1,629.77	1,616.56	Y

VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2016 – DECEMBER 31, 2016

PMEWS Data Availability Summary - 01-Oct-16 to 31-Dec-16



Unit	Source	Data Availability %	Permit Availability %	Unit Uptime Hours	Probe Uptime Hours	Consent Decree
VP-1	Dryer	100.00	90.00	1,554.23	1,554.23	Y
VP-1	MUF	100.00	90.00	1,711.04	1,711.04	Ý
VP-1	Process Filter	100.00	90.00	1,711.04	1,711.04	Ý
VP-1	Purge Filter	99.95	90.00	1,554.23	1,553.38	Y
VP-2	Dryer-1	100.00	90.00	1,638.88	1,638.88	Y
VP-2	Dryer-2	100.00	90.00	1,151.06		10000
VP-2	Dryer-3	100.00	90.00	1,587.35	1,151.06	Y
VP-2	Dryer-4	99.75	90.00		1,587.35	Y
VP-2	Dryer-5	100.00	90.00	1,581.44	1,577.43	Y
VP-2	MUF	99.70		693.71	693.71	Υ
VP-2	Process Filter	100.00	90.00	1,920.68	1,914.93	Υ
VP-2	Purge Filter	100.00	90.00	1,920.68	1,920.68	Y
VP-3	Dryer		90.00	1,826.88	1,826.88	Y
VP-3	MUF	99.91	90.00	1,715.41	1,713.95	Y
VP-3	Process Filter	100.00	90.00	1,790.06	1,790.06	Y
VP-3	Purge Filter	100.00	90.00	1,790.06	1,790.06	Y
VP-4	Control of the contro	100.00	90.00	1,715.41	1,715.41	Y
VP-4	Dryer	99.98	90.00	1,862.62	1,862.23	Υ
	MUF	100.00	90.00	1,906.08	1,906.08	Υ
VP-4	Process Filter	100.00	90.00	1,906.08	1,906.08	Y
VP-4	Purge Filter	99.75	90.00	1,862.62	1,858.03	Ý